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UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF CALIFORNIA

In re:) Bankruptcy Case) No. 19-30088-DM PG&E CORPORATION,) Chapter 11 and) Jointly Administered PACIFIC GAS AND ELECTRIC COMPANY, Debtors.

> ************ TELEPHONIC TOWN HALL

> MAY 2, 2020 ***********

Page 3

1 And I think for me today, I have a couple of things that 2 I'm thankful that I'm going to have an opportunity to 3 share. And to do that, I'm going to back up just a 4

So do I -- do I have, you know, five minutes to say something, Mikal?

MR. WATTS: Go ahead. Go ahead. MS. BROCKOVICH: Okay. It's always a deep breath for me, even looking back, as we all watched the horrific fire situation in 2017 and 2018. I became involved early on up in Santa Rosa through Doug Boxer. I was introduced to this amazing team that is on the phone, working with Gary Morrow and Noreen Evans and Spencer Zach and countless staff members, who I saw mobilize very quickly and were already out on the ground to try to help people. They were so organized in how they were getting information to those in need and working to set up information to be shared through e-mails, through town hall meetings, having a location for people to get to, and handling it all so swiftly as a solid presence in and for the community to help those that have lost so much and to help them find information and a possible path forward.

One of the first things that we fought back at that time, knowing down the road it could be

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MR. WATTS: Hi, folks, this is Mikal Watts. I apologize for our late entry. We had a little bit of technical difficulty.

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So on the phone today, we have a number of lawyers, and we also have Erin Brockovich and Senator Noreen Evans. Both of them have been pivotal in our effort to communicate the project against PG&E. And then, in addition, we have Robert Bryson from the Robins firm. We have Richard Bridgford and Jim Frantz from the Frantz Bridgford Group. We have Jerry Singleton, and then we have Joe Earley and Roy Miller from the group that I'm with.

So what we'd like to do is start off. Our goal is to answer your questions. So if you have questions, press star 3. But, in the meantime, what we're going to do is we're going to start off with just everybody making a brief statement.

As opposed to me starting off making a statement, what I'd like to do is invite our headliner, Erin Brockovich. Erin, can you make some comments?

MS. BROCKOVICH: Yes, I can. I don't know how long I have to speak, and I don't want to take much time, because I know everybody always has many, many questions. But I want to say hello to everyone. I am happy to be on the call. I hope everyone is doing well.

Page 4

very harmful to all fire victims of the future, and that was working to stop the strict liability and inverse

2 3 condemnation situation happening in the legislation.

4 Noreen Evans was completely an amazing, amazing asset,

5 working with the team to stay on top of this situation,

6 making sure that it didn't happen. And we ended up

7 being successful. Any such litigation like that could

8 have resulted in no form of justice for fire victims in

9 the future. It was too much to bear at the time that we

10 turned to another disastrous fire, and that was in 11

Paradise, California.

I really feel compelled to say it's been such a privilege to continue to be working with this team that I have watched mobilize quickly into Paradise and to start working with local counsel, Joe Earley, and taking action to help those that have been harmed.

And I really want to say something very personal today for all of the fire victims, and I -- I feel I need to say it to you. I think of you all the time, and I think of everyone I've met from Paradise and up in Northern California. And to see us here today in this conversation, in this moment everyone has worked so hard for, brings so much to my mind.

I have -- over the past couple of months, all of you have been so much in my thoughts, as we're

1 (Pages 1 to 4)

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living out COVID-19. There have been personal days for me where I just wanted to crawl under the covers. I felt dazed and confused, and I'm not sure what has happened. And then I truly begin to think of you.

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I have watched the courage that you have exhibited during a disastrous time, where you showed up to meetings, many of you had no homes, living in your cars, the fears or concerns, your loss. Yet I watched you rise up and come to those meetings. You listened. You learned. You were involved. And I want you to know from me that I am in awe of that. I always believed in the power of we the people. And you are such living proof how during the worst of circumstances that we can stand up and we can find our way forward, and you have exhibited a strength, a courage, and a determination that is inspiring to many of us.

I truly know you don't need to hear this from me, but I want to say it: I am so proud of you and I am so inspired by your courage and, more often than not, I think of that and I see you and I find myself saying in a crisis that we're, once again, all experiencing together, that, yes, I can face the day and I can move forward. I know it's been a long road getting to where you all are today.

This team of attorneys have worked hard on

your behalf to reach an agreement and settlement that's

1 always here, constantly running around in the

background. And in my gut, this settlement has been

Page 7

3 reached fairly. Everybody was involved at the table,

4 reaching this settlement, and it can help make you as

whole as we possibly can. Yes, I want you to know I

understand it is PG&E, and I get the lack of trust that

people have. But I do have trust in this team of

8 attorneys. I do have trust in the bankruptcy court and

9 the Judges' decisions that will hold and keep this

company accountable in this settlement. I have absolutely no reason to believe that there is any or

absolutely no reason to believe that there is any other deal somewhere out there that somebody is not aware of,

because I'm certainly not aware of any such situation.

The time is here. It's been a long journey, and now it's up to you, the people, those that were harmed. This was your loss, your life and your future, to vote on how you wish to move forward so that you can have that moment in your life of justice and you can see a better path moving forward.

That is what I wanted to share with all of you today and I do appreciate you taking the time and listening and I wish everyone safety and wellness not only during some of the most unusual circumstances I think we've all ever lived through, but yet you've been through there and you've lived through it. Stay safe,

Page 6

been approved by the bankruptcy court, and it brings me back to the time in Hinkley where the final agreement came down to the people's vote. It was the same process as you're experiencing today. There were so many questions, yes, and not everyone always agreed. But it was their vote and their decision. And this is your vote and your decision. It happened to them and it happened to you. They came together as you've come together. They had meeting after meeting and they listened to all the information and they made an informed decision of their vote, just as you are. I

trusted and I believed in those people, as I do in you

I want you to remember this is your vote.

I want you to remember this is your vote.

We are here to answer questions, any and all questions, on the eighth town hall that the team has come together and will do endlessly for you and town halls, but ultimately it is up to you. And I am the same today as I was back then. It's your courage, your determination that's brought you to where you are. And now it's your turn. It's your vote to see your justice so that you can move forward as whole as possible into your new life.

I'm aware of everything that goes on. I'm

Page 8

strong, and courageous every single day of your life.

MR. WATTS: Thank you, Erin.

So I asked Erin to get on because there were a couple questions last week about what Erin's present position is. I think that that'll tell you what it is. And Erin has been a champion of this effort from -- I mean, she was in Santa Rosa days after the North Bay Fire and Chico shortly after those fires. Nobody deserves more credit in their attack and their effort against PG&E than Erin Brockovich. I'm proud to have her on our team. I hope that today gives you an indication of what she feels.

And so what I'd like to do right now is switch to Noreen Evans, who is a state senator or was a state senator in Santa Rosa, a community leader, has been involved in this for upwards of two and a half years. Noreen, can you help us?

MS. EVANS: Yes, absolutely. Thanks,

19 Mikal, for the introduction.

And thanks, Erin.

Can you hear me?

MR. WATTS: Yeah, go.

MS. BROCKOVICH: I can hear you, Noreen.

MS. EVANS: Okay. Thank you, Mikal, for the introduction and thank you, Erin, for all of your

2 (Pages 5 to 8)

Page 9 Page 11

1 comments.

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My -- in addition to being a former state senator, I'm a long-time attorney. And in this litigation I've had a front-row seat to some of the best lawyering I've ever seen, and I want to thank all the lawyers and all of their support staff who have worked so hard and gone toe to toe with PG&E. And I want to thank all of you for sticking with us. As Erin said, it's been a long, rough road. And it's been that the wheels of justice grind slowly, and nobody knows that now better than you do.

I remember back when we were holding town hall meetings two years ago now, and one of the things we talked about is how one of the few tools we have to change corporate behavior is through lawsuits like this one. It's one of the -- the reasons why we urged you to take action against PG&E, not only to make sure that you're made whole, but also to change the corporation's behavior, because for years they've been blowing up and burning down so many of our communities. And because all of you stepped up, we finally are seeing some great changes in process. From the bankruptcy court to the Governor's Office and the State capitol and the criminal court, PG&E is finally, slowly, but inevitably being held accountable for the first time for all the damage

important and it makes us who we are. And I want to thank you for meeting this one head on, being part of the movement to hold PG&E accountable and bringing yourselves, your families, and our communities to a better and safer tomorrow. And I truly appreciate all of the trust and the faith that you've had in all of us here that have been handling the litigation. Again, thank you to everybody that's been a part of this.

MR. WATTS: Thank you, Noreen.
So the folks that we've got on the line
are some of the lawyers with the most "cases" in the
case. The Watts Guerra group, which includes Roy Miller
and Joe Earley, has 16,095 clients, unique individuals
with timely filed notices of claims. I can tell you as
of last Tuesday, 13,329 had voted to accept, 148 had
voted to reject. That's an acceptance rate of
98.9 percent. So we feel like our clients are
overwhelmingly in favor of the deal. Of course, it's
everybody's individual vote.

But what I'd like to do is talk to a couple of my partners in our thing. Roy Miller, can you tell us what you're seeing over in Santa Rosa with respect to how people are voting and what their concerns are?

MR. MILLER: Thanks, Mikal.

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that they've done to us for so many years. It is not the same company today as it was two years ago, and two years from now, we will see even more changes, and all of that is thanks to you who stuck with this process.

So my message to you is we have two things to celebrate: One, of course, first and foremost, is getting you paid, getting you made whole; but, second, is changing PG&E's corporate culture to protect the future of our community. And I realize we're not done yet. Many people are still voting on the proposed settlement. And disbursing the settlement funds is going to take some more time. But the silver lining in that is until everything is paid and ramped up, the spotlight will remain on PG&E's bad behavior -- bad behavior, and our need for PG&E to change. And now is not the time to let up on PG&E or to lose our momentum.

And I'm just going to leave you with one last thought. Again, going back a couple of long years here. When many of you sat in my office still traumatized and grieving from the fires, I promised that in two years we'd be on the road to a better future, and we are. Nobody knew, though, that we'd be facing yet another calamity with the COVID virus. But one of the things I've learned in my life is that life is full of calamities. It's how we meet those challenges that is

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People here in Santa Rosa that I've talked to -- I've answered quite a few questions about the process. I've answered quite a few questions about the stock portion of this deal, which is a concern to people, but I think they understand that with a claimant group this large and a settlement as large as it is, the third largest, that there was going to be a stock component; but people understand and are real about this and they want to move forward, and that's why my client group, which is part of Watts Guerra, has been overwhelmingly in favor of it.

I'm living in the middle of a construction zone. Four homes around me are in the framing stages. So we're rebuilding. The rest of Santa Rosa is rebuilding. People need the money that is available through this settlement to complete that process, and they want to move forward. And we're going to do everything we can to help them reach that goal and answer any questions you have along the way.

Thank you, Mikal.

 $\label{eq:MR.WATTS: Joe Earley in the Paradise} \\ Camp Fire area.$

MR. EARLEY: Thank you, Mikal. I want to thank my clients that are the victims of the Camp Fire for their absolutely overwhelming support and their

3 (Pages 9 to 12)

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understanding that we're truly in this together. We're going through the same process. I appreciate that people appreciate that. It means a lot to me.

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Look, I feel very confident, given the numbers that Mikal was giving us, that we're, in a sense, going to be over the hump real quick here and moving towards the real work, which is getting your claims processed and resolved, and that's where the rubber hits the road.

Right now it is important to me that everyone, to the extent they can, understand that this really is a good settlement that we should be voting for. You know, every week we ask to be shown a viable alternative plan to our 13.5-billion-dollar settlement, and that's not just what people hope and wish for, like, a, "boy, wouldn't it be great if" plan, but a real plan, a solid plan that's actually got support to it, financial support and backing.

still, we got nothing, we hear nothing. If there was something, we would look at it and we would -- we would support it, if there was actually something that would -- that is better than what we have. So that's something that's really important that people

understand. We only have two weeks to go now, right,

And, you know, another week passes and,

our e-mail is chico@wattsguerra.com is always available, and we'll take care of you. For other people who are not my clients, who have not voted, please just contact your lawyer as soon as you can, and let's just get moving forward.

So, anyway, thank you, everyone, for the support. I really want to thank my friend Erin Brockovich for her understanding of what we're going through, what she -- she really has been along on this ride. It's been my honor to work side by side with her. She gets what we're going through. And there is a reason why she's supporting this plan. She knows that that's the only way for us to go.

And, finally, I really -- I got to say thank you to Mikal Watts. He has been fantastic in this. He has worked his tail off. And, really, it bothers me deeply how he's become this target that people are attacking this man who is going to bat for us, and I know that because I work with him on a daily basis. I know he's there for us. I appreciate that. I'm just sorry you have to go through this, Mikal, people bringing up stuff that has nothing at all to do with this settlement. No one has said there's anything wrong with the settlement, and that's just not the way it should be. If you're going to attack something,

Page 14

for voting. We're getting at the end, and now is the time to do it. Putting it off, waiting, as a lot of people were advocating for, well, we've waited and there's nothing there. So let's get the votes in and get this done with. I truly believe that the more support we show for the plan, the faster the process is going to unfold and the sooner we're going to get our

So I'm going to say please vote electronically. The U.S. Mail has been just horrific. People we sent out physical ballots to, you know, weeks ago, and they still haven't got them yet. And this is very frightening, because everyone should have their opportunity to vote, and I fear that two weeks is cutting it just way too close for sending out paper ballots.

So, please, for my clients, if you haven't voted, contact me directly. You've got my phone number. You've got my e-mail. I'm -- I'm easily accessible. I will make sure that you get a formal ballot. You can't just vote with me. You can't just say, hey, Joe, I want to vote yes. A lot of people have tried to do that. But we have to go through a formal process. I will forward you on to the right people to get a formal ballot so you can do that. Please do that. Otherwise,

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attack it on the merits and don't play those kind of games. So I thank you, Mikal. I just want you to know that

MR. WATTS: Well, I appreciate that, Joe. And, you know, Watts Guerra has about 98.9 percent of its clients, about 13,329 vote to accept, 148 have voted to reject. It's everybody's decision, but it's basically, 98.9 percent of our clients. So one of the concerns that we have is, obviously, I'm under attack by the three or four people that don't want this to happen. There is an article in the New York Times. There is an article in The Wall Street Journal. There is an article in the Bloomberg News. There is an article in the San Francisco Chronicle. But that's not really a concern to me. I mean, I've got thick skin. What I wanted to know is some of our other compatriots who are also doing the best they can for the fire survivors, what are they seeing with their client base.

So Jerry Singleton has the second largest number of clients after our group. I think, Jerry, you've got over 7,000 clients. What do you see in terms of your clients' decision whether to accept or reject this plan?

MR. SINGLETON: We're seeing pretty remarkably similar numbers to what you're seeing. We've

4 (Pages 13 to 16)

had about half of our clients vote. Initially, there

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- was an issue with Prime Clerk, and so we had to figure
- 3 out how we were going to address that in terms of smart
 - phones. And I do, again, want to apologize to everyone
- 5 because I know that you've been receiving a lot of texts
- 6 and calls. Again, the reason for that was there was an
- 7 issue with Prime Clerk and the smart phones. So Watts
- 8 Guerra was able to assist us with some of the
- technology. We all worked with Prime Clerk, and we were
 able to get that phone issue resolved. But we've seen
- over 98 percent of our clients support the plan.

And, again, I know Mikal and everybody on the call share this, it is absolutely up to the

individual. If you do not believe this plan is in your

best interests, you absolutely should vote against it.

16 We represent you. We'll do whatever you want. But I

think it is heartening to see that so many people are

supporting it. And I think, following up on what was

said earlier, the reason for that is very

20 straightforward. There just is not any other viable

option. If this plan is not approved, then it will

result in the contingency plan that has been approved by

the Court being put into place. PG&E will be sold off

in pieces over a period of, likely, two to three years;

and then at the end of that, people will get paid out of

I'm sure they're on several other websites. So if you are interested in those, please ask your attorneys for them.

And then, lastly, before I get off, I just wanted to thank Erin and Noreen for being on this call. And, also, this is something that really has not been given enough publicity because of all the things that have been going on. But as Erin said, in 2018 PG&E and the other utilities spent tens of millions of dollars to try to get rid of inverse condemnation to limit their liability. And Erin, Noreen, and a number of people were very influential in defeating that, and so I wanted

to thank them for doing so.

MR. WATTS: Yeah, I remember even before the Camp Fire, I mean, Erin and Noreen and all sorts of people were advocating in Sacramento with the group Up From the Ashes to stop the abrogation of inverse condemnation. Thank God that happened because six weeks later we had the Camp Fire, where 14,000 of you were burned out of house and home. You have a right of cause of action because of people like Noreen Evans and Erin Brockovich.

So, just to be clear. So Roy Miller, Joe Earley, and I collectively represent about 16,000 people who are voting for the plan at a rate of 98.9 percent.

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the proceeds there.

Unfortunately, because bankruptcy deals generally result in a significant discount, in all likelihood, people are going to get 50 to 75 cents on the dollar, and, obviously, that's not something that anybody wants. So I think, at least in my experience, when we've been able to explain that to people, they have been very supportive.

One thing that I would really encourage everyone to do, whoever you are represented by, whether it's our group, whether it's Mikal, Joe, and Roy's groups, whether it's Robert Bryson at Robins Cloud, go to your counsel, and if you have any questions, they can answer them and they can give you the documents. Because one thing that is very clear when you read the documents is that there is no other available plan and that this is the only way forward for us to get out of the situation we're in now. So just wanted to stress that

Also, this is something we're going to touch on during the remainder of the call. But on Friday, yesterday, the trustee released the trust and the claims resolution procedures, and I know a lot of people had been waiting on those. They're on our website, I know they're on the Watts Guerra website, and

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I think Jerry Singleton represents another 7,000 people who are voting for the plan at about 98.81 percent.

So -- so two other people we've got on the line is my friend Jim Frantz and Richard Bridgford. They're working together. I think collectively, they work -- they represent 4300 people.

Jim, tell me what your -- what your client base look like. Are they for this, against this? Are they having a similar experience that Jerry and I are having? What are you seeing?

MR. FRANTZ: I would say it's almost identical. We have over 4300 clients, and so far we have 2,083 that have voted to accept and just a mere 26 voted against the plan. And, you know, so we're doing great. Our clients understand how important this resolution is and the fact that there is absolutely no other plan out there. And without this going through, it's going to be a really huge problem for everybody getting any indemnification on this case. But, so it's great success in the voting right now.

But I want to thank all the lawyers on the call with me. I'm proud to work alongside of you-all. You've been working tirelessly on this case. And I want to thank Erin Brockovich for the kind comments that she made to us and to -- especially the victims, and the

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victims are the ones we're all here for.

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I want to acknowledge Todd Vector, John Dixon, and Ray Montega that are working tirelessly with our group, our group, Rich Bridgford, Pat McNicholas, and my law firm, Frantz Law Group. And I know the clients that they work with are very proud to be with our firm and have worked through them.

We have clients in the North Bay Fire, Redwood Valley, Napa, Atlas Peak, that entire area, and they have been waiting since 2017 to get indemnity on this case to get back with their lives. It's been a long time. And the horrible Paradise Fire, there is -our hearts go out to all the folks there, all the lives that were lost.

So we -- we really, really have no option other than to accept this plan. I think it's a really great plan. It provides what we believe to be close to a hundred percent indemnity for everyone. It's not going to bring back any lives that were lost. As far as all the property damage itself, we think it pretty much covers the gamut of what's required and necessary. Singleton stated, if this is not approved, then we go back into another process with the Court, which would take several years and probably significantly less

MR. WATTS: There you go.

MR. BRIDGFORD: Yeah, I'm -- my name's Rich Bridgford, and I'm working with the McNicholas firm and Jim Frantz in a three-firm JPA. And I just want to say I'm honored and privileged to be working with the other firms here towards getting this plan approved. And, you know, folks, they say the arc in history is long, but it bends towards justice. I'm going to go out on a limb and predict we are going to get this plan approved and that we are close to obtaining justice.

And two principal things that we seek through this plan, first of all, to make you whole to the greatest extent possible; and, second of all, to change the corporate behavior at PG&E and to make the -make the states safer for all of you. I want you to know that I -- I go to bed thinking about this case and I wake up thinking about this case. And along with my good friend Jim and the McNicholas Firm, working seven days a week and, you know, we're getting to the point now where we got to start focusing on getting you compensated. And, as Jim said, that's not going to bring anybody back. We can't do that.

But we now have the outline of how the claims resolution procedure is going to work, how we're going to get you compensated for your real property,

Page 22

here will be almost a hundred percent made whole versus something else that will happen, which is not good, if they don't vote for the plan.

return to the victims. So the key is return to victims

Although as Jerry and others have said, you have the right to vote your conscience. I don't disrespect any of the 26 of the 2,083 clients that we have that voted against the plan. I just think that maybe they have a different view of it, which, you know, you can vote your conscience, but I think going with the plan is the only way to go here.

Thank you.

MR. WATTS: Okay. Thanks, Jim.

So, you know, the Watts Guerra group,

which is Roy Miller and Joe Earley and myself, has about

98.9 percent of their clients voted for the plan; the

Jerry Singleton group, 7,000 people voted, about

17 98.81 percent; and the Frantz group is about

18

98.77 percent. One of Jim Frantz's partners is Rich

Bridgford. He has been very helpful in terms of

2.0 allowing us to assess the stock and all. 21

Rich, what -- what are your -- what are your clients telling you about what they think about

23 this deal?

Hey, Rich, you're on mute, buddy. 24

MR. BRIDGFORD: Mikal, sorry about that.

Page 24

lost structures, trees, your personal property, your personal income loss, your business income loss, your

3 emotional distress, living expenses, a whole host of

4 different categories that we're going to be seeking

compensation on your behalf. And I'm sure the other

6 attorneys on this call share in this sentiment with me,

7 and that is please, you know, respond to the e-mails

that you receive and get us the materials that we need

so that we can go about maximizing your potential recovery.

10 11

As Jerry mentioned, we hope that there will be enough money here to make all of you whole, and that is -- that is the goal. And it's been an honor representing you. We're going to continue to work as hard as we can going forward on this case to change their culture and to put the money in your pocket to make up for your loss.

Thank you.

MR. WATTS: Thanks.

And then last week -- you know, I've been working with Jerry Singleton and Jim Frantz and Rich Bridgford. I just wanted to make sure that our data was not anomalous, that what we were seeing was unusual. So we called our friend Bill Robins, frankly, way back a decade ago with some friends of mine from Texas, and

6 (Pages 21 to 24)

he's got Robert Bryson, who is kind of the managing partner of his firm working on it. They've got over 2,088 cases.

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Robert, what are you seeing in terms of what your clients are thinking about, how they're voting on this deal?

MR. BRYSON: Well, first, let me thank you again, Mikal, for this opportunity and all the folks that are on the phone that many of you of whom I personally met, both from the '17 and the '18 fires. So what we're seeing from those folks, you're right, we have just over a couple thousand folks that joined with our firm, gave us the honor of representing them, we're seeing just shy of 98 percent approval of the plan. And a few folks voted their conscience and voted against it, somewhere around 20. So we're seeing a very consistent voting pattern, I think, across all firms that represent a very large number of fire victims.

And I think this sentiment was echoed by Erin and many of the lawyers on this call. I, unfortunately, and I want to emphasize the word "unfortunately," have been involved with fire losses for almost 20 years from San Diego to Los Angeles to Northern California. And it's heartbreaking to see the

same blank stare on everyone's face after they suffer

loved ones, obviously, we can't replace those cherished

items, and we can't restore your body. All we can do is

to, quote, unquote, make you whole, which is to provide

you with monetary compensation so you can restart your

life and have an opportunity to hopefully live a better

6 life. So we're trying to restore you to what you were,

7 in a rather crude fashion. But it's important to

8 recognize that with -- in my opinion, without this plan,

9 that restoration will take an untold number of years, 10

and there is a lot of question to what that compensation would look like, as opposed to what we're voting on

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And so all of my clients, I've made clear, whether I spoke to on the phone, spoke to in person, responded to your e-mails, responded to your texts, is that our firm has studied this, and we recommend it because we believe it provides you the best possible opportunity to be compensated in a timely fashion.

And, also, as most of the lawyers on this call have noted is to finally force PG&E to become a corporately responsible partner in the community as opposed to the opposite, which I personally would -- if I never had to respond to another fire loss, that would definitely be a plus in my career for the past 30 years. So to everyone on the phone, I thank you for your hard

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such a catastrophe.

And so what -- what this bankruptcy plan offers is -- is closure for people, and it's the best possible closure that everyone on this call and an army of other plaintiff fire claimant victim attorneys have been fighting for. And I also want to echo the comment of some of the other folks on the line that it is your right to vote. We as your attorneys, we make recommendations based upon studying information and our knowledge of the overall of this case, but ultimately it's your -- your decision whether to vote yes or no. And we, my firm and all the other attorneys on this line, support you in your decision, whether it's to approve or disapprove.

But I think if you take the time and look at it closely, you'll see for a variety of reasons that this plan is the best possible opportunity for you to finally be compensated. And when I say "compensated," and the word has been thrown around a maypole, it's important to recognize that you have suffered a tragic loss, whether it's the loss of a loved one, some -- we have a very kind lady that suffered third -degree burns on 30 percent of her body or people that have lost their

homes and everything, their cherished possessions, that

you're -- what you're seeking, we can't replace those

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work and it's been a privilege to work along side you and we will continue to do so.

And, Mikal, thank you again for having me today.

MR. WATTS: Yeah, of course.

Hey, so I'd just like to say something before we start with the questions and answers. You know, it seems like, between the folks on the line and some other folks with whom we have discussed the situation, as of Tuesday you had lawyers representing 31,388 cases, about 20,229 who voted to accept and 272 had voted to reject. So at least as far as this group could tell, it's about a 98.67 percent acceptance rate.

But I want to be clear. There are four people who I have had the opportunity to get to know. Tom Tosdal representing Kirk Trostle. Rocky Baldesian representing a former member of the TCC. Fran Scarpulla, who represents, I think, eight clients who, you know, a gentleman burned down -- had a restaurant burned down. Will Abrams, who is an individual who is a fire victim. Steve and Bonnie Kane represents Karen Gowins. They're lobbing all sorts of missiles against me, and that's okay. You know, they feel very strongly, and I respect their view. I've been on Facebook Live. I've debated this with them. There is all sorts of

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Look, I think that instead of engaging in a back and forth about, you know, what's going on, you can look at five, six different law firms representing over 30,000 people and see that 98.67 percent of all the claimants who voted that we're familiar with have voted yes. So the fact that you have three or four people, you know, screaming and yelling on the front of the New York Times, The Wall Street Journal, Bloomberg, San Francisco Chronicle, trying to castigate whatever they allege that I'm doing, I'm not real worried about that.

What I am worried about is I want to make sure that everybody has a chance to vote. We have sought diligently to give people the information they need to vote, and that's why we're doing this town hall meeting. So we want you to be able to vote. We want you to have the information that you need to -- to vote intelligently. We think the plan is going to be confirmed, and we think you should vote for it. That being said, we want you to be informed.

So here's our thoughts from hereon out: The bottom line is that we think that this is the plan that is the best plan available. We think that this is a plan that gets you \$13 and a half billion as quickly fires that is covered by this PG&E case. You have to be one of them. That you have timely filed a proof of claim and you've submitted supporting documentation,

3 4 which is outlined in the rules. And upon submission of

5 those documents, the trust will review each claim and 6 consider the damages and costs recoverable. And they'll

7 apply California law or other nonbankruptcy law, if they 8 need to.

All the fires that are listed in the document, in the trust rules, is assume that PG&E caused the fire and is responsible, so we're not dealing with a question of whether or not they did it. The proof of claim must have been on file on or before December 31st, 2019, which was the extended claims date. If there were claims that were not filed during that time period, they're not eligible for payment unless the claimant obtains relief from the bankruptcy court to file a late claim and then files it within 30 days after being allowed to do so.

The type of categories that are involved and the supporting documents, the trust will use information that assists it in evaluating your claim and doing all they can to relieve you guys the burden. So what they will do is they will look at the proof of bankruptcy claim form and the Wildfire Assistance

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as possible, and we'll go from there.

So one of the things that happened is that yesterday the trustee of the trust Honorable John W. Trotter, the claims administrator Cathy Yanni, filed a document, it's Document No. 7037, it's entitled, "Notice Regarding Filing of Plan Supplement in Connection With Debtors' and Shareholder Proponents' Joint Chapter 11 Plan of Reorganization." So what I'd like to do is kind of take you guys through that.

And, Roy, let's start with you. What are the general rules that apply to the claims process according to this new document and do they apply equally to the Tubbs Fire versus the other fire?

MR. MILLER: Okay. This is part of a 2,000-page filing that got dropped on the bankruptcy case yesterday. So Alicia O'Neill and Jon Givens, among others at our group did some breakdown, and these are some of the general rules. Keep in mind, this is subject to being approved by the Judge later, and you're going to be able to see it in writing for yourself, because there is a lot to it. Like everything else in this case, it's complicated.

But here are some of the general rules: To be eligible for compensation, you must have a claim related to an included fire. So there is a list of

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1 Program claim form, if you participated in that. This

is what we call in our group the CMO 5. It was a Case

3 Management Order No. 5, which I'm sure most if not all

4 of the groups filled out, and any other reasonably

5 ascertainable and reliable information. So, for

6 example, your insurance documentation, your declaration

7 page, proof of what your insurance company paid you, 8

photographs, and things like that. And that's -- those 9

are the basic outlines, in general.

Thanks, Mikal.

MR. WATTS: Great.

Okay. So those are the general rules. What I'd like to do is ask Robert Bryson. There is different categories, one of them is what I call real property losses. Robert, explain for the folks on the line what real property losses can be claimed.

MR. BRYSON: Thanks again, Mikal, I'll be happy to do so.

This is an important loss that persons have suffered. And, just to be clear, when we're talking about real property, maybe people take this for granted, but this is folks that owned the property, whether that's a homeowner or a business owner that owns the land, for example.

So what does a real property claim

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include? And I -- it's going to include your home that 2 you lost or your commercial real estate structure that 3 you lost and then everything associated with it, for 4 example, landscaping, trees, other improvements that you 5 made to the property down to, say, if you had a very 6 nice mailbox at the entrance of your driveway and it was 7 a nice brick structure and that got destroyed in the 8 fire, then the value to replace that is something that 9 will be included as well, along with other types of 10 hardscape. If your walkways are damaged, your fencing, 11 retaining walls, pools, solar panels, anything and

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considerable amount of time and energy to improve your property is something that would be included. And then how -- once you identify what it is that you can claim, the things you lost, it's then how is that -- lawyers call it a damage. That's just a fancy word for your loss. How is that measured? How do

everything you can think of that you spent probably a

And there is two ways in California. The first is the loss and the fair market value of your property. So if your property was worth X immediately before the fire and then it's now worth less, which is Y, immediately after the fire, the difference between the two is called, another fancy lawyer phrase,

you figure out that value?

So what -- what you look to next is how -how is diminution in value calculated? And I kind of hinted at hat. It's -- it's the value of your property immediately before the fire versus immediately after the fire. So, unfortunately, the property value is going to dip after a fire, as many of you have seen, if you put your lot up for sale -- which that's another important note. Remember, at the beginning of this I said it's important to maintain your ownership and that that's critical, because if you sell your lot -- and you may have a legitimate reason for doing so, and we all understand that. We're not -- we're not questioning that. It's just that there is a -- a consequence to that which can be that you would be limited to fair market value in -- in your damage for the loss that you suffered versus your cost to repair because you don't own the property anymore.

So then we turn to the next item, which is, all right, how do we calculate the cost of repair. So when you're looking at the reasonable cost to rebuild your property as opposed to fair market value, there is a number of items that you're going to be -- we're going to be wanting to obtain from you and/or obtaining independent in order to be able to prove up your claim to maximize your recovery, should this plan be approved.

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diminution in value. It's, basically, the difference in the value of the loss and the value of your property. The second way is what's referred to as the reasonable cost to rebuild or repair your property, and I think everyone understands what that means.

So then the next question comes, well, which one is it? How do I know whether it's the reduced value of my property that's my damage or the cost to repair? Well, as everyone on this line knows, the lawyers, there is a specific jury instruction that provides guidance. Now, granted, we're not in a trial setting anymore, but at least it provides what California says and, in short order, it says that ordinarily you can only recover the fair market value loss. However, let's say, for example, a homeowner had a desire, for a personal reason, to rebuild their home, because the view, because they love their neighborhood, whatever the reason might be, even if that cost to repair is more than the fair market value loss, you can recover your cost to repair.

And I'm confident that all the lawyers on this line here are going to be fighting for the maximum amount of money that each of you would be entitled to recover for the loss of your home or your commercial property.

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- And I'll -- I'll just highlight some of the examples. 1
 - You're going to have -- you're going to be looking to
- 3 the use of those structures, the extent of damaged. If
- 4 it was -- it was a total burn-down, smoke, or some type
- 5 of heat damage, we're going to look to the square
- 6 footage of your structure, the geographic location of
- 7 your property. Where your property was situated can be 8
- very important. Also, the -- the vegetation, meaning
- 9 your trees, your shrubs, and things located on the
- 10 property. And then, of course, you're going to look at
- 11 the fair market value before the property and then after 12 the property.

And in addition to that, all those factors, the trees have a separate and independent value from, say, for example, your home. In other words, we can recover separately for that and that's a different calculus and all of us on this line and your lawyers are looking to arborists to help us make those calculations.

So then this is a big factor, and it kind of melted into what I was talking about before, which is I just talked about how you calculate it, but now we want to look to what do we need to prove it. And let's start with an obvious. If you're a homeowner, you're going to have a grant deed. Now, my firm has been pulling that from both the tax assessor's office and

9 (Pages 33 to 36)

also working with our clients to obtain that. And then we also if you've got appraisals, your -- your mortgage loan documentation will be helpful.

Any -- this is significant -- photographs that maybe you could get from friends and family or if you had them on the -- in the cloud somewhere or on your phone, if you were fortunate enough to save your phone. Photographs before the loss, and then we compare those against photographs after. We know that the loss -- the photographs after are going to show. It's going to show near or complete devastation. But the pre-photos were able to show maybe some of those cherished items that you lost or the home -- what your home looked like, the trees, et cetera. So those are very important.

And another critical aspect is the plan.

Now, sometimes that can be difficult to obtain. We had a couple folks that were preference folks or older people that were not in the best of health. We were going to go to trial. We were going to go to trial for them in San Francisco Superior Court. And I -- I had to track down the plans. I had to actually go and meet with the architect to get my two clients' plans. Why those are so important, I think everyone understands. With the plans, we can give those to a general contractor or a similar type of expert who can then

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to give out right now, but I've received many, many calls from folks that have been concerned. So please feel free to reach out to us if you have questions about whether you've provided this information.

And then I urge everyone else on the line to contact your lawyers as well to make sure that you've provided them with the information that I just outlined in a quick format so that we have the best opportunity to prove up what you lost relative to your real property.

So thank you, Mikal.

MR. WATTS: You bet.

Hey, so, Rich Bridgford, let me ask you this: My friend Fran Scarpulla, I think he's got eight clients in this case and his signature client is a restaurant that did not burn down, but, you know, they lost economic damages and like that. What type of business losses or other out-of-pocket expenses are recoverable for somebody like Fran's client who their property didn't burn down, but their business shut down?

MR. BRIDGFORD: Thank you, Mikal.

So the question is what types of business claims qualify? And under the claims resolution procedures, business loss claims include claims for economic losses suffered by a business that were caused

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basically calculate what it would cost to replace the home that you had in conjunction with your description of, let's say, some of the finishes of your home. And with that information, we've got a really, really good idea of what it would cost to rebuild your home.

And then, finally, one of the other things I mentioned a moment ago is arborists. We hire these very smart folks to help us value trees, which is a unique industry, and they have different methodologies to do that or ways to do it. And there is two different deals. You'll have ornamental trees. Those are trees around your house. They're going to have a different way to value those as opposed to someone that might have a large swath of land that is timber and they had sold it in the past. So we use arborists to help us in that calculation.

There is also a final damage that is available to you, and that was -- we'd have to spend a lot of time talking about it. It's called consequential damages. Those are recoverable as well, but we don't have the time, nor the place for that.

If you have questions on any of this and you're a Robins Cloud client, and, as I mentioned last time, you can call 310-929-4200 or all of our e-mails are available. And my cell phone, which I'm not going

by the fire, the result of the fire. And that includes the loss of business property or inventory used to conduct the business as well as lost profits or revenue.

Now, a moment ago Mr. Bryson referenced, you know, the word "prove." And we're not in a court of law here, but the claims administer -- administrator, trustees are going to be looking for certain backup information in order to document these types of claims. Particularly in regard to the lost profits and revenue, a track record of your business is going to be important.

So what types of documents will be required? The claimants may provide the following document to support a business loss claim. First, a description of the business is important, including its mission statement. Second, tax returns, including the schedules and attachments will be important in establishing the profits, the revenues, and the activity of the business. Third, financial statements, including profit and loss statements, also important in establishing what the loss of the business was. Fourth, Articles of Incorporation, bylaws, shareholders lists or partnership or limited partnership agreements, those are important in substantiating the business. Fifth, lease, leases, deeds, titles, or other documents identifying

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the property owned or occupied by the business, whether you owned the property or rented it. Sixth, cancelled contracts. Seven, photos, videos, other documentary evidence of the fire damage to the claimant's home or business and other supporting documents within the claimant's possession. All of these will be important in documenting your claim.

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And I'm sure the other attorneys are doing this as well. Respond to the staff questionnaires and things that we send out and get us that information so that we can recover for you.

Related to the foregoing is the question, are there other out-of-pocket expenses that are recoverable? The answer to that is yes. Other out-of-pocket loss claims include claims for out-of-pocket expenses that are not considered in any other type of claim under the claims resolution procedures. These could include additional living expenses, medical and counseling expenses, and other out-of-pocket expenses which you incurred specifically as a result of the fire. The types of supporting documents that the trustee and claims administrators will look for include documentation supporting a claim for additional living expenses, medical bills,

counseling bills, and other supporting documents within

mentioned the list of items that you had. You can also

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do that by showing proof of purchase; receipts, if

3 you're able to obtain those; photographs, photographs

that are on your phone that may show what you had on the

5 walls in the background of the photo, might show the

6 artwork that you had. You might even have a photograph

7 of a particularly nice piece of jewelry, that sort of 8 thing. Photographs are very helpful. If you had an

9 appraisal of something, sending a copy of that appraisal

10 would help. Any kind of photographic or paper evidence 11 you can show that you owned the property, what the

12 property was, and what its value is. 13

The other question was whether personal income loss can be claimed, and the answer to that is yes. Personal income loss claims include claims of individuals who lost income because either you were displaced by the fire and couldn't work or your employer was harmed by the fire and either reduced your income or stopped paying you or had to let you go or you sustained some kind of injury in the fire that interfered with your ability to earn income. So that would be your income loss claim.

You will have to be able to prove what you lost, and you can do that through a variety of ways, including your tax returns that show the income you had

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claimant's possession.

Thank you.

MR. WATTS: Awesome.

Noreen, let me ask you a question. What personal property losses can be claimed? I mean, tell us about personal property income loss.

MS. EVANS: Sure, Mikal, happy to do that.

You can think about your personal property loss as everything that's not attached to your house or your landscaping and everything that is part of your business. So that would include everything in your home and your garage, outside, in your car, it includes your -- all motor vehicles, your car, your boat, your motorcycle, all of your appliances in your house. Go through your house room by room and remember what you had in there. It's everything down to the teaspoons.

17 It's all your furniture, and clothing, all your

18 equipment that you had in the garage, music, books,

artwork, jewelry, everything that you had. That's --

20 you're going to have to make a list. That's the dreaded 21 inventory that we all talked about a couple of years

22 ago. You have got to prepare that list. You have to be

23 able to prove everything you owned that you lost in the 24

25 So how do you do that? First of all, I Page 44

prior to the fire versus what you earned after the fire,

W-2 forms, 1099 forms. And if you lost income as a

3 result of losing a rental home or something like that,

4 you can also prove that income loss by a copy of the

5 lease agreement or canceled checks that you had received

6 in the past. You can also look at your bank account

7 statements that will be able to show what you earned

8 prior to the fire versus what you were able to deposit

9 after the fire. Paycheck stubs from your employer and 10 other documentary evidence such as that. And, yes, you

11 can claim any income you lost from renting your home or 12 other rental property. So that's also your -- part of

your claim as well.

MR. WATTS: Very good. Thank you, Noreen. I appreciate it.

16 Hey, let's go to a different issue. Joe 17 Earley, tell us about the wrongful death cases.

What's -- what's the status of those?

18 19 MR. EARLEY: So we represent -- we 20 represent several families of people who tragically died

21 during -- in the fire, directly in the fire and

22 that's -- that's a rough one. That's a rough one, ever, 23 just to think about. We also represent several families

24 of people who died subsequent to the fire and as a

result of the fire, because of the increased stress or

11 (Pages 41 to 44)

circumstances. A lot of people didn't have their medications, for instance, that they were dependent upon and they couldn't get them because they evacuated so quickly and frantically. There is a number of reasons. But we represent several of those families. That's — that's a tough — that's a tougher job, because people die regularly for many reasons that are not related to

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But in this case, we have to prove that it was related, so we have to have a physician look at all the records and come to that conclusion that there really was a -- that there was causation between the fire and the -- and the death. So that's something that takes awhile. It's a bit of -- it's a bit of work. But we've been successful in obtaining, you know, very good, strong medical opinions about -- about that, and I think we're going to not have any problem at all demonstrating to the -- you know, the process that they were "deservant" a recovery for the loss of their loved ones.

And then the -- the claim for -- the kind of general claim, nonspecific, noneconomic claims, they're -- they're going to be the hardest, in order to quantify, of all of this types of damages. There is no tables to look up what's the value of a relationship or the value of pain, the value of losing, you know,

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So, that being said, all we can do is the best we can do. So they set up rules, and these rules they set up, they're intentionally vague. They kind of have to be. I think that gives the people making the determinations, it gives them some flexibility to do the right thing. And they're going through a process, and, certainly, that's -- that's why lawyers are there, too, to make sure that these rules are followed.

But if you like, Mikal, I can read through the rules that they need to follow. Would that be helpful?

MR. WATTS: Sure.

MR. EARLEY: So, first, qualifying just -what was just provided by the Court, that the -- in the
claims resolution process that the others fellows were
talking about. Wrongful death and serious personal
injuries include claims, related individuals who died or
suffered serious personal injury as a result of the
fires. The trustee and claims administrator will devise
procedures ensuring a streamlined and sensitive process,
providing claimants and their family members the dignity
that is critical to successfully resolving claims
relating to these extraordinary losses. So you can see
that's intentionally kind of generic. That's probably
good, because that allows them more flexibility to what

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sentimental items that your family has had forever and now they're gone. This is all very, very subject to -- to someone's opinion. And that happens all the time in the courtroom. People have to decide what's the value of the loss of a life and, you know, pain and so on. In this case we're going to have to leave it up to a referee as part of the claims resolution process, and we have to trust that they will be fair and deal with the individual's losses properly.

In the many, many community forums and client forums that we have put on I always believe, almost without exception, would discuss something in my life that I had lost that was never -- could never be replaced. It has a value, a deep, deep, deep sentimental value to me, but has really no economic value. And I -- I did that to make it clear to my clients that we understand, that I understand the depths of that, the depth of that loss and that they'll never be -- you can never really be made whole, you can never really get that back. So I know that no matter what we do, we will never walk away thinking, gosh, I'm back where I was. That's never going to happen. You can have the nicest home, you can have your vehicle back, but you'll never, you'll never get that loss, that part of your soul that was ripped out and burned.

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they really need because there are such individualized
 losses.

What types of supporting documents can be submitted? Well, again, you know, the claimants may provide medical records or other documents supporting a wrongful death or serious personal injury claim, as well as documents supporting the claim for loss of relationship, love, support, and companionship. That's something that your lawyers should be working with you with, if you're in that category. That's not necessarily needed to prove, but we do the best that we can.

So what types of claims and proof can be provided for emotional distress and PTSD? So emotional distress claims include claims arising from -- this is important, these categories -- the zone of danger evacuation from the fire. That's the circumstances under which we left the fire. Some of us were fortunate enough to be ahead of the flames, then some of us were unfortunate enough to be stuck with the flames all around. That's called the zone of danger claim, emotional distress claim and those claims need to be supported in some way, whatever you've got, and it can be your testimony, because you're -- we're all entitled to give our under oath testimony, you know, under

12 (Pages 45 to 48)

penalty of perjury and all that. So we have to be honest, but whatever that is, that type of claim.

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Then physical injury, that's a little more easy to show because there will be some kind of medical record probably showing the physical injury.

Then -- then the more difficult one is one that they refer to as a substantial interference with the use and enjoyment of or invasion of the property occupied by the claimant as well as the impact of the loss of community. I mean, those are very, very general terms, but those of us who lost our cherished stuff and our cherished lives and our cherished community understand how real that is and it's deep. But how do you -- how do you put a price on that? I don't know. That's -- that's going to be up to the trustee. We will try to put forth the best argument that we can.

Another section related to what types of supporting documents can be provided for that, and they list several. They can provide a written narrative or an audio or a video narrative recording the details of the evacuation, and that will -- you know, that will depend on the circumstances how best to do that. So that's part of your lawyer's job, is to come up with the best way to convey the reality of what you went through to get out.

anything. They're keeping it very, very general, and that's -- and that's good.

Documentation of medical, counseling, and expenses. Other -- just to show you how open they are to looking at the whole picture. Other supporting documents in the claimant's possession. So that's a wide door. So we just have to work with your lawyers and see what there is to substantiate, and, you know, we'll put the best foot forward on that claim.

And there's -- here's another -- another example of how wide the door is for these kind of claims. The question is, are there other damages that may be recoverable. And the trustee and claims administrator will devise procedures to evaluate any additional category of recoverable damages. So it's a matter of just expressing what the -- what the damages are, you make the claim for it. We hope that the -- the administrators can understand exactly what -- what -what that translates to on a -- on a personal level. And, hopefully, there will be a recovery that at least you can feel like -- like somebody cared and -- and maybe do something to enhance your life to try to make up for those losses. But it's going to be a tough one. On the other hand, I'm also looking forward to making sure that's done fairly for my clients.

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Texts, e-mails, social media posts, and so on, those can be very, very helpful in laying that out; and, presumably, a lot of that has already been collected and submitted to your lawyers. Photos and videos, of course, taken during the evacuation are critical, or can be critical, but not necessary, because some of us were worried about just getting out and not about recording the event, but a lot of people did, and thank goodness for that because that's going to be an important factor in determining the values.

Prefire, post fire photos and videos of the property showing the stuff that you lost that's meaningful to you, and then, of course, an explanation as to why they were meaningful. This was a lot of work. We understand that.

The records describing bodily injury and mental health counseling or treatment. If possible, everyone should be getting some kind of treatment, even aside from the lawsuit itself, just for their own survival, because it really wreaked havoc on our -- our brain functioning and our relationships and so on. So any records of such treatments or diagnoses can be really critical. Again, they're very vague. They're not saying that a psychiatrist has to provide a declaration or anything. They're not specifying

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Thank you for that, Mikal.

MR. WATTS: Yeah, awesome.

Hey, so I know that we've got seven

Hey, so I know that we've got several of the folks from, you know, North Bay Fires, Noreen Evans, Roy Miller. One of our partners over there is Michael Fiumara, and his husband, Gordon Larsen, passed away recently. Michael is one of my big-time buddies for two and a half years. And he's -- he's part of our team as well. So I didn't want to leave that waiting.

Hey, Jim Frantz, let's see whether we can go -- how will these claims be submitted? Tell me about how we're going to submit all this information and will there be a form to fill out.

MR. FRANTZ: Yeah, Mikal, yeah, there is. The claims processer will maintain a secure web-based portal and — and that's for the claimants to submit their claims questionnaires, supporting documents, releases and any other relevant information or documents. And after submitting their claim, the claimants will be able to use the portal to check their claim status and receive and respond to determination notices, submit supplement material, update the contact gap information that they have or any demographic information, if necessary. And there will be a form to

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So in addition to the claim specific supporting documents, the claims administrator will require the claimant to complete a claims questionnaire that provides sufficient information to, No. 1, verify

the claimant's identity; identify and support the claim damages in the case; No. 3, demonstrate the claimant's

authority to assert the claims, in other words, like,
 for your house, a copy of the deed, for example.

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Jim.

for your house, a copy of the deed, for example.

Individual claimants may submit claims questionn.

Individual claimants may submit claims questionnaires by

household. What does that mean? Well, if you have a household, a husband, wife, and three kids, the head of the household may submit claims questionnaires by the

household, including all the information for each individual that was in the house.

The claims processer will pre-populate claims questionnaires with information already in its possession, including, but not limited to, the data from the claimant's bankruptcy claim proof of claim form, the one that you've already filed; the Wildfire Assistance Program claim form; and damages questionnaire established under the CMO No. 5 in the California North Bay Fire cases and information that is otherwise reasonably ascertainable and reliable.

And, as a practical matter, we have submitted questionnaires to all of our clients, and the

That goes to a claims administrator, who's going to look at it and then issue a written determination notice.

3 That determination notice lets you know what portion of

your claim has been approved. So it may be that the

claims administrator approves your entire claim. It may
 be that he or she approves a certain percentage of it.

And that amount is the approved claim amount.

Once you get that approved claim amount, then you have the opportunity to object to it and to ask for more. And, for example, you can provide additional information. If, for example, the claims administrator says I was not able to award a hundred percent on this aspect of the claim because you were missing X, Y, and Z, then you can provide that to the claims administrator.

Ultimately, you are going to go back and forth, and you are going to reach the final amount that that claims administrator is willing to pay. If at that point you don't believe that it was reasonable, then you have the opportunity to appeal, and what you do is you file a request with the trustee and ask that all or part of your claim be appealed. And by "a part," what I mean is it could be, for example, that you were happy with the real property, the personal property and the loss of income -- or the loss of income, but you didn't like the

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questionnaires asked for all of the damage information that's available during this wildfire as to the claims that we're making. And so we would really encourage all clients and our clients to answer the questionnaires as completely as possible so we have all the information we need to evaluate, assess, and come up with a damage allocation on your case. It's very, very important that we get cooperation from you and get the questionnaires filled out completely and accurately. And, as with all the other law firms on this call, everyone has staff standing by to assist, to the extent necessary, if you have a problem filling out questionnaires.

Hey, Jerry, once a proof of claim form is submitted, what happens? I mean, how is the money decided? Is it appealable? Give the folks some thought about that

MR. WATTS: All right, excellent. Thanks,

MR. SINGLETON: Sure thing. So this has been clarified a great deal by the documents that were filed yesterday. But, essentially, what happens, as Jim said, you submit a proof of claim. That proof of claim is supported by all the documentation, Rich touched on this as well, that your attorney gathers, and we do everything we can to maximize the value of that claim.

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noneconomic amount or something like that. You notify the trustee of what your appeal is going to cover, and you also say whether or not you want the document review only, whether you want a telephonic hearing, whether you want a document review followed by a telephonic hearing, or if you would like an actual full-blown hearing in front of a new hearing officer.

If you request that, then a new individual, a new claims administrator will be appointed and the entire process is done again over, de novo, meaning from scratch. So if, for example, the award was 200,000, the claims administrator who hears the appeal would have the right to award less or more, and the final decision must be made within 30 days of that hearing.

Once that final decision is made, if you're still unhappy, then you can make a final appeal directly to the trustee, which is Justice Trotter, and you can submit the same information again.

Justice Trotter will review it, and then his decision will be final

MR. WATTS: Okay, awesome.

MR. SINGLETON: Go ahead.

MR. WATTS: We've taken the basic questions we've got. Let's take the questions that

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people are typing in. Press star 3. Press star 3, and we'll answer your questions.

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that?

MR. ROECKER: Okay. Let's take our first question. Somebody asked if there were -- if there were only 25,000 structures burned, why are there 75,000 claimants?

MR. WATTS: Jerry, do you want to take

MR. SINGLETON: Sure, I'd be happy to. That happens for a number of reasons, and, basically, the simple answer is that it's not just the loss of the structure that is compensable. For example, if you were living in a town and there was damage done to your property, but your home survived, for example, the trees on your lot were burned down, any number of things could happen, then you can make a claim for that. It's not just the structure.

In addition, though, many homes were rented. And so when you have the destruction of a rental home, that gives rise to two separate claims. The renter is entitled to recover for their personal property and for their emotional distress, but at the same time, the owner is entitled to recover for the damage to personal property.

And then, finally, you have another

dealing with her emotional distress claims and her loss of income claim. And then her second question is, with more fires going on, are they part of the current lawsuit?

MR. WATTS: So, Deborah, let me answer that. The first is for the forms, yes. We're waiting on the final forms from Justice Trotter and claims administrator Cathy Yanni. Expect those imminently. I am in the process of hiring between 35 and 50 law students to help us help you fill out the claims. We've got all sorts of people. I've got 111 people working for me that are going to help us with that. So, yes, you're going to have help. As soon as we get the final claims, we'll start that process.

And then, Sam, what was the second question? I lost track. I'm sorry.

MR. ROECKER: The second one -- let me find it here.

UNIDENTIFIED SPEAKER: It was about the current fires.

MR. WATTS: Oh, yeah. So the current fires, I'm going to use Kincade as an example. Any fire after the filing of bankruptcy is called a post filing administrative claim. Kincade is that. It will not be out of the \$13.5 billion. Kincade is the one fire that,

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- category which is purely the emotional distress, and
- this is particularly prominent in someplace like
- 3 Paradise. You know, we all have heard about just how
 - horrific it was getting out there. It was -- I mean,
- 5 the descriptions literally defy the imagination in terms
- 6 of just how bad it was at the end there. And so if you
- 7 were someone who did not lose a structure, but you were
- 8 fleeing the area and were placed in fear for your life, 9 then you're certainly entitled to make a claim for that
- 10 emotional distress, although you're not, obviously,

11 going to have a claim for real property if your

12 structure survived and wasn't damaged. 13

So that, in a nutshell, is how it works, is it's not just the destruction of the property; it's the destruction of any type of real property, personal property, or emotional distress. And then the other thing to remember is that 77,000 claims, that's 77,000 individuals. So while you may have had X number of structures destroyed, if there were two people living there, then now, all of a sudden, that would get doubled. So that's how it all works out.

MR. WATTS: All right.

MR. ROECKER: Mikal, the next one is from one of your clients in Santa Rosa. Deborah wants to know if people are available to help fill out the forms

you know, will have to be dealt with by the company.

2 And, of course, if there is another fire this fall, we

3 got AB-1054 that should cover the majority of that. At 4 the same time, you know, if there is -- if there is

another issue, it will be handled administratively, not

out of our 13.5 billion.

MR. ROECKER: Great. The next question, looks like it's from Nasi, and he says he had 2 acres of oak trees that burned down. How can he evaluate the cost of removing and the price of the trees?

MR. WATTS: Sure, Jerry, you want to handle that?

MR. SINGLETON: Sure. That's -- I think Rich touched on this a little bit earlier, but that's where the arborist comes in. So what will happen in that situation is your attorney will hire an arborist. The arborist will come in, and they'll look at a couple of different categories. No. 1 will be what it will cost to remove all of the dead trees and make it safe. The next thing will be how do you replant. Obviously, you cannot replace like for like. If you had a mature oak tree, it's not possible to move one that large in. So what they'll do is they'll come up with a program for planting trees, and that will likely require irrigation and things like that. And the final thing they'll do is

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they'll look at the loss of esthetic value, because it's going to be a number of years, unfortunately, before the trees that they plant come anywhere near approaching what it was that you lost.

So they take all of those damages together, they add it up, and then that's the value of the loss. They put that in their report. And then your attorney will submit that along with the rest of your package.

MR. WATTS: Okay. Who's next? We got about 28 minutes. Let's keep going.

MR. ROECKER: Next question is from Ann. She wants to know, as far as the nonsalvageable list, is there a deadline for getting that turned in? And do you need the list that she has made up or the list that insurance will give her -- give her showing depreciation.

MR. WATTS: Roy Miller, do you want to answer that?

MR. MILLER: Sure.

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The short answer is we want everything. If the insurance company has already given you back a list of your items reflecting depreciation, we want that. If you have additional items that you recall having lost, we would like that as well. The more

a third-party neutral or an arbitration panel after that will be delayed. But I think the goal is to get most of the money out this year or early next.

MR. ROECKER: Great. Madelyn wants to know if she needs to be getting her own estimates for replacement of out-structures and then also property not associated with the house, like lawns, retaining walls, shop buildings, or RV shelters.

MR. WATTS: Yeah, well, the main thing is we need you to get that information to us so we know what it is. We have people that will help assess that. But if you've got your own estimates, we'd like that as well

MR. ROECKER: And then Kim wants to know how renters are -- are dealt with in the settlement.

She keeps hearing a lot about homeowners, but wants to know specifically about renters who did not have insurance.

MR. WATTS: Sure. Jim Frantz, do you want to handle rentals?

MR. FRANTZ: Renters are treated similarly to other real estate property owners. They will value the claim for the losses of rental, but they will file a claim for all their personal possessions. And to the extent they have emotional distress, annoyance, and

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detail that you're able to provide your lawyer, the better and the more information the trustee administrator will have to be able to compensate you for the loss.

In terms of the deadline, obviously, we

want it sooner rather than later. The Watts Guerra group is going to try to get the process started in June. All the groups are probably going to be doing something similar. So whenever you can get that to us would be great.

Thanks.

MR. ROECKER: Great. Faith says that she wanted to rebuild in Paradise, but it looks like it was going to be cost prohibitive and also no guarantee of a water supply, so she ended up moving, but still owns the lot. They're wondering about the time frame of the settlement and the pay-out.

MR. WATTS: All right. What's next?

MR. WATTS: So, Faith, on the time frame, I think that the goal of the trustee and the special -- I mean, and the claims administrator is to get a lot of the money out towards the end of this year, first quarter of next year. I think they're going to try for a quick play that gets rid of about 65, 70 percent of the 13.5 billion. And the people who want to appeal to

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discomfort damages, they will have those available to them as well as far as the evacuation and the ordeal after finding a new rental and all the experiences that they had after the fire that were difficult for them.

Any loss of earnings, that's another issue that they'll be able to make a claim for to the extent that they can prove that up.

Okay

MR. WATTS: Okay.

MR. ROECKER: Chris is wondering what order the claims will be processed. Is it alphabetically, smallest to largest, or how is that dealt with?

MR. WATTS: I think it will be based on when the claims come in. I mean, I don't think it's alphabetical. I don't think it's, you know, date of the fire. I think it's going to be more like who gets their stuff in and out.

MR. ROECKER: Jerry on-line wants to know, what if you owned an item and you don't have a record of it

MR. WATTS: Rich Bridgford, do you want to handle that?

MR. BRIDGFORD: The question is what if you owned personal items, is that the question?

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MR. ROECKER: Yeah, what if you owned an item, but you don't have a record of it?

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MR. BRIDGFORD: I believe you still make a claim. We are -- we're using adjusters that have checklists that have been compiled over a period of 20 years. My partner Jim Frantz in these cases, has been doing these fires for quite a bit. And the bottom line is the purpose of that inventory that we provide our client is to trigger things that they may have even forgotten about. And the fact that you don't have records of it does not mean that you shouldn't -- shouldn't claim it. Of course, you shouldn't invent anything that you don't have.

But I would be surprised if most of the victims have records of everything that they ever owned, unless they kept all their receipts in a box and they -- they taped everything they had in their house.

MR. WATTS: Okay. Sam, what's next?

MR. ROECKER: Mark wants to know if there is a dollar amount estimate of the claims combined and, also, will the administrator use a standard percentage of replacement value to establish fair market value?

MR. WATTS: Bryson, do you want to take a shot at that?

MR. BRYSON: Yeah. I'm sorry, what were

to establish for you will vary, and that will create uniqueness for each home.

MR. WATTS: Okay.

MR. ROECKER: Darren wants to know if they have already rebuilt, landscaping, hardscaping, fencing, et cetera, do they need to go through all of it to estimate reasonable cost to rebuild?

MR. WATTS: Jerry.

MR. SINGLETON: Sure. The answer to that question is that it depends and the answer -- and the reason for that is because what you're entitled to recover is not necessarily what you rebuilt; it's what you lost at the time. So, certainly, the costs that you actually expended are very relevant, but in order for it to be apples to apples, you would have had to have rebuilt substantially the same house. So if you rebuilt the same house, the same basic floor plan with a few minor adjustments, that you're not going to have to really do much else. As long as you have the costs of actually building it, then you're fine.

On the other hand, if you did what a lot of my clients do and decide to make some changes, which is perfectly appropriate, then you probably are going to have to get an estimate from a contractor because they're going to have to opine as to what it would have

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the two questions again? Just to make sure I got it straight.

MR. ROECKER: The first one is is there an estimate of the total amount of all the claims combined? And will the administrator use a standard percentage of replacement value to establish fair market value?

MR. BRYSON: Okay. So in response to the question, that's a simple no. It's unknown at the moment. What we do know is the pot of potential money to recover, which is 13.5 billion.

As to the second question, I think many of the lawyers on the phone spoke to that. There is going to be uniformity in the way claims are addressed, but claims vary from claim to claim, property to property. For example, let's say you had a home in Paradise that you lost and then someone else had a home that they lost in Sonoma County. Those are different counties, different geographies, different property values, different costs to rebuild. So all those differences will factor into valuing the cost to replace potentially your home versus someone else's home.

So while there will be a standard in a sense that everyone will be treated fairly, applying the same rules, the fact that the form -- the proof of your claim or the basis for your claim that your lawyers want

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cost to build the exact same home you had at that time.

minutes left. What else do we have?

MR. ROECKER: Yeah, Stephanie would like to know if the loss of a pet is recoverable in the settlement.

MR. WATTS: Okay. We've got about 18

MR. WATTS: Yeah. Robert Bryson, tell us about California law and the loss of pets.

MR. BRYSON: Well, I don't mean to be the bearer of bad news, because I -- I have some dogs and I've had pets my entire life. Unfortunately, although pets, many of us probably on the line, generally, especially in California, often treat them as family members. The current state of the law, which I'll say personally I do not agree with, is that pets are treated as akin to personal property. So you can recover for the loss of a pet, but you're not going to be able to recover for the emotional loss associated with that pet. It's going to be a very cold calculation as to what your turtle, your German Shepherd, your cat may have been worth in order to replace that particular -- like, for example, you might have had a German Shepherd that was highly trained and not only your children enjoyed, but served as security for your home, and you paid a pretty penny for that -- that particular dog and the training.

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Page 71 Page 69 1 That would be factored in as something you could seek to 1 MR. WATTS: I think -- I think I speak for 2 2 recover. However, you wouldn't be able to recover the everybody. I mean, we're going to -- we're going to 3 3 loss that the children and you suffered from the loss of send them digitally, we're going to mail them, we're 4 4 that family member. going to, you know, push you guys pretty hard to get 5 MR. WATTS: Okay. What's next? 5 them done. I think we're going to have a, you know, 6 6 MR. ROECKER: Peter would like to know, computerized fill-in claim form, where we're filling in 7 7 what's the best contact info for all the law firms for data and having you submitted it, something like that. 8 8 clients to get in contact with, phone numbers and We don't have that yet, but I know that Jerry has been 9 9 working with, you know, Justice Trotter and Cathy Yanni. 10 MR. WATTS: I think for Watts Guerra, I 10 I think that's imminent. I don't think they want to 11 11 mean, if you're in the Camp Fire area, it would be send out the claim forms before the vote because they 12 12 chico@wattsguerra.com, don't want to seem presumptuous. It's your call. But 13 13 c-h-i-c-o@w-a-t-t-s-g-u-e-r-r-a.com. If you're in North we have rough drafts of that. We have a pretty good 14 Bay, it would be santarosa@wattsguerra.com. 14 idea what's going to happen. I would not expect a lot 15 15 And the other guys, go ahead. of delay from the time of confirmation until the time 16 MR. SINGLETON: Hi, this is Jerry. 16 that these claim forms are sent out. And we'll 17 17 Go ahead, Jim. certainly get them to you immediately. 18 18 MR. FRANTZ: I was going to say for Jerry, you got a thought? 19 Bridgford, Artinian, McNicholas and McNicholas and 19 MR. SINGLETON: Yeah, I think that's 20 20 Frantz Law Group, it's wildfires@frantzlawgroup.com. right. We are working on it. The final procedures are 21 21 And the phone number that is utilized by all the clients supposed to be approved and have everything up and 22 22 for all three of our firms that are joined together is running by July 1st. So I think the next two months 23 23 855-735-5945. we're going to be finalizing them. And once the vote is 24 MR. SINGLETON: Oh, this is Jerry -- oh, 24 approved, I think we'll have -- we'll be in a much 25 I'm sorry, go ahead. 25 better position. So hopefully we can get people drafts Page 70 Page 72 1 UNIDENTIFIED SPEAKER: Go ahead. Go 1 by the end of the month, early next month, and start 2 2 getting things submitted in July. ahead, Jerry. 3 MR. SINGLETON: Sure, this is Jerry 3 MR. WATTS: Yeah, I think that's right. 4 4 Singleton. For us, you can either talk with anyone What else we got? 5 5 MR. ROECKER: Yeah, Jennifer has a loss of you've been talking to or e-mail me directly anytime you 6 have any issues. My e-mail is Gerald, G-e-r-a-l-d, 6 income question. Her husband worked at a hospital and 7 @slffirm.com. Our number is 619-771-3473. 7 then when they moved, his guaranteed salary was less 8 MR. WATTS: And -- and Robert Bryson. 8 afterwards. Is that something that they can claim? 9 9 MR. WATTS: Yeah, Rich, you want to -- you MR. BRYSON: Yes, for Robins Cloud 10 clients, I mentioned before, our number is 3 -- we have 10 want to answer that one? 11 MR. BRIDGFORD: Yes. The issue here is 11 different numbers. I'm going to give you the primary 12 number. 310-929-4200. 310-929-4200. And then I would 12 causation. I believe that they -- they can, if they can 13 13 prove that they were dispossessed of their property by echo what Jerry mentioned, that there is a number of 14 14 the fire. They can claim what I would call the delta folks that many of our clients have been in contact 15 15 with, some very hard-working team members. You probably and any consequential damages as well. 16 16 MR. WATTS: Okay. All right. What else have their e-mails. And you can reach us, of course, 17 through our website at robinslaw.com. And my e-mail 17 we got? MR. ROECKER: Yeah, Jennifer has another 18 address is on my business card, and it's not hidden from 18 19 view, is rbryson@robinscloud.com would be the best way. 19 question about submitting a claim. If they have 2.0 MR. WATTS: All right. Who do we have 20 submitted everything to the attorney, will the attorney 21 next? 21 then submit the claim to the processer, or do they just 22 MR. ROECKER: Next is Frank. Frank wants 22 resubmit everything on their own? 23 23 to know about the proof of claim papers. Are they going MR. WATTS: No, no, we'll submit it for 24 24 to be mailed out to the clients, or do they need to pick you. 25 25 MR. ROECKER: And then we've got John. them up?

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John says he made his insurance payment and received a pay-out on the losses incurred. In terms of coverage, is the fact that they received payment from the insurance, does that matter?

MR. WATTS: You're not going to get to recover twice. So whatever you recover from the insurance will be an offset against whatever your damages are going to be. So we want you to get every dollar you can from the insurance company because you don't have to pay us a fee, which is good. We're here to get you over and above what the insurance companies have paid you.

MR. ROECKER: I've got Michelle. Michelle is a Tubbs Fire renter. We did not have rental insurance. She had to take out an SBA loan for money to replace everything. Will the loan be something that they can get reimbursed for?

MR. WATTS: Robert Bryson, what's your thoughts on that?

MR. BRYSON: Well, just to be clear, what we would do as your lawyers is we would make sure that you give us a complete list of all the personal property that you lost and help you value that property along with, unfortunately, depreciation. You can't get the replacement cost. You get the value based upon the

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process, obviously, you'd want to talk to a lawyer about what you would need to do in order to effectuate that -- that change in the ownership of those -- of those assets or your claim. So it all depends on what's going on within the trust or, you know, a will or nothing at all. So that's something that you're going to need legal advice on, should that unfortunate event occur. Let's hope it -- let's hope it doesn't.

MR. WATTS: All right. So, excellent. We've got about nine minutes left. Let's take two or three more questions.

Sam, what do we have?

MR. ROECKER: Yes, Doug wants to know if he's allowed to sell his lot.

MR. WATTS: Robert, what are your thoughts?

MR. BRYSON: Well, all of us that are fire victims -- I mean, let me rephrase that. All of you that are fire victims and you're confronted with a myriad of different reasons why you might need to sell your lot. We as your lawyers to understand that. But, as I had mentioned at the beginning of this discussion, it can dramatically impact our ability to recover moneys for you. The easiest way to understand it is that if you sell your lot and you have to move, of course, you

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condition, et cetera. So we would work hard to get you the maximum amount that we can recover for all of your lost keepsakes, personal property, et cetera.

But if you had to take out an SBA loan to help you to be able to replace them in the interim, we couldn't then seek that as an additional damage and you would still be responsible, of course, under the terms of that loan to repay it, unless that loan is forgiven. That might be something you want to look into.

MR. WATTS: All right, sounds good. Sam, what else you got?

MR. ROECKER: Marilyn -- yeah, Marilyn wants to know if she were to pass away before the settlement, would her portion still be hers and how would they know to give it to her kids?

MR. WATTS: Joe Earley.

MR. EARLEY: Yeah, and that'll depend on what -- what aspects of the claim. There are certain -- certain of our damages that will not survive our death. Emotional distress would be the most obvious. But, otherwise, that's really just part of an estate. Like, whatever -- whatever your estate plan says happens to

your estate, those would be -- and your claim is an
asset in your estate. So however that says it should

go. Should that happen during the -- during this

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lost your home in the fire, whichever fire that was, we couldn't seek the cost to repair your home because you don't own the lot. What we could recover is that fancy lawyer word, diminution in value. So that's the difference between what your property was worth before the fire versus after the fire. And, generally, although not always, that's a lower value.

So on behalf of Robins Cloud clients and all the other lawyers on this phone, I'm sure they would echo my sentiment that if you can do it financially, we would strongly urge you to maintain ownership of that lot so that we then can go after the cost to repair everything that you lost on that property, because that generally is a very significant loss.

MR. WATTS: Okay.

MR. ROECKER: And then John was reading about the stock. He just wants to know how PG&E stock is affected by the recent market downturn.

MR. WATTS: Rich, do you want to take that one?

MR. BRIDGFORD: Sure. The simple answer is that PG&E stock, I think -- I didn't check it last week, but I think it's doing as well or better than it was before the fires. I think I learned that from you, Mikal. I didn't actually -- I actually hadn't charted

19 (Pages 73 to 76)

Page 77 Page 79

1 it, but I believe that's the case.

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And in relation to the stock sort of — sort of — that question is sort of pregnant with the following, and that is how is the stock going to work. And, just briefly, I think it's very important to know that the stock that the victims' trust fund will receive and that the trustee will appoint financial experts, Houlihan & Lokey being one of them, Canadian bank for the TCC, to manage the stock. Okay. It will be stock in the new PG&E.

So what happens in bankruptcy is if this plan gets voted in favor of and the Judge approves it, you issue stock in the new PG&E, which is what attorneys know as post discharge. So that stock will no -- will be in a new company that will not be saddled with all of these claims that we're making here. Those all go into the victims' trust fund that's funded, and PG&E no longer has responsibility for those claims. All of the FEMA, California claims, insurance subro claims, all that stuff falls by the wayside, and you, basically, emerge with a PG&E that hopefully has the money from 1054 to remediate future fires, harden the grid, and is, basically, collecting every month utility rates from 17 million different customers.

Now, apart from the fires, this is a very

to go. So watch out for that.

Within the next two weeks we'll be sending you a text, a voice mail, whatever, telling you, hey, we got 50 people working on this to set up times, because, you know, it looks like -- I've been criticized for pushing the vote too hard. I mean, I don't think we have. I want you to vote when you're ready to vote and not before then, but at the same time, we got a lot of work to do. Same thing on the claim form.

Just because the claims administrator may give you six months to do it, we want to be in the front of the line because you get paid first. So really be putting together your contents information, your structural valuations, evidence you were in the fire zone, mental anguish type stuff. And then we'll get you started. We're not -- we're not going to start until June 1, not because we want to wait until then. It's just that's the best evidence I've got as to when we'll be able to have people physically in the office out there in Santa Rosa and Chico.

Sam, we got about three minutes. What else?

MR. ROECKER: Yeah, Rita wants to know if she has to include photographic evidence with her claim. She doesn't have a lot of photographic evidence. She

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sound economic model. So we're very hopeful that stock will do just fine.

MR. WATTS: Who else has got a question? We've got about four minutes left.

MR. ROECKER: Phil is a 73-year-old Camp Fire client who does not really know much about computers. He wants to know if he'll be able to just go into the office and deal with all of this in person rather than on-line.

MR. WATTS: Yeah, Phil, right now you can't because we're sheltered in place, but my expectation is -- in Texas we just opened up a little bit. I think by June 1 you'll be able to open up.

bit. I think by June 1 you'll be able to open up.

And just so that everybody knows, over the course of the next several weeks we're going to be sending you a text designed to get you lined up with a schedule of an appointment to allow you to get your claim done. We're going to make you a full disclosure about all this stuff you've been reading in the New York Times, The Wall Street Journal, and the San Francisco Chronicle tomorrow and get you to waive any conflict that you see. I don't see it. But the bottom line is the main goal is we want you to sign up and schedule yourself. We'll have 50 people working on this around

the clock, making sure that your claim forms are ready

just wants to make sure she's not going to lose out.

MR. WATTS: Yeah, Rita, my answer is is include whatever you've got. I mean, obviously, your claim is stronger based on proof, but I can't make you re-create something that doesn't exist. So whatever you can find, send to us. If you can't find it, tell them. And I think we should be okay.

MR. ROECKER: Then Lori wants to know if she's able to file a claim for the amount of time spent working on rebuilding, researching, cleaning up, et cetera.

MR. WATTS: Yeah, it's what's called a consequential damage. I don't have any problem with you submitting that. I'm not saying you'll get it, but it can't burt

MR. ROECKER: Great. And then Doug wants to know, is it one person voting per household, or how many votes should they be having?

MR. WATTS: You should be having as many different "claims" as there were.

MR. ROECKER: And then Gloria, she had a question about personal property loss and emotional distress. She had to relocate out of state and hasn't submitted anything, documentation to her lawyer yet. Should she now or just wait until the claims portal is

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Page 81 Page 83 1 open? I, PHYLLIS WALTZ, a Texas Certified Shorthand Reporter, 2 Texas Certified Realtime Reporter, Louisiana Certified 2 MR. WATTS: You know, I think she ought to 3 Court Reporter, Registered Merit Reporter, Certified 3 get it ready. I think she ought to get it to her Realtime Reporter, and Certified Realtime Captioner in 4 lawyer. But I don't think she ought to be killing and for the State of Texas, certify that the foregoing 5 5 herself until the claims portal is open because it's 6 is a correct transcription, to the best of my ability 7 from the audio recording of the proceedings in the 6 almost done. 8 above-entitled matter. 7 So we've got about two minutes. Any other 9 8 questions? 10 I further certify that I am neither counsel for, related 9 MR. ROECKER: Judith wants to know, she 11 to, not employed by any of the parties to the action in 12 10 had two -- two homes. She wants to know if she can which this deposition was taken, and further that I am 13 not financially or otherwise interested in the outcome combine the square footage and just file one claim. 11 14 of the action. 12 MR. WATTS: Well, if you made two claims, 15 Certified to by me this 3RD day of MAY 13 you should file two separate claims. If you made one 16 2020. 17 14 claim, file one claim. My gut is we want to keep it 18 15 simple, but, more important than simple, we want to keep PHYLLIS WALTZ, RMR, CRR, CRO 16 it consistent with whatever the claim form was. 19 Expiration Date: 12/31/20 17 So, guys, it's about 3:59. We're going to TEXAS CSR, TCRR NO. 6813 20 18 shut it down for the week. Please feel free to e-mail Expiration Date: 12/31/21 LOUISIANA CCR NO. 2011010 19 us your questions. If you're a Watts Guerra client, 21 Expiration Date: 12/31/20 20 e-mail us at santarosa@wattsguerra.com. If you're in 22 21 the North Bay Fires, then chico@santarosa.com [sic]. If Worldwide Court Reporters, Inc. 22 you're in the Paradise fire or the Camp Fire. If you 23 Firm Certification No. 223 3000 Weslayan, Suite 235 23 got any other questions for any of the other lawyers, 24 Houston, Texas 77027 24 e-mail it to them. We're coordinating on a daily basis. (713) 572-2000 25 Our goal is next Saturday, May 9th, we 25 Page 82 1 want to answer every question you got. The voting ends 2 on May 15. So please plan to attend May 9th. We have a 3 lot of people that were saying, hey, wait to vote until 4 May the 1st. News flash, it's May the 2nd. It's time 5 to float -- time to vote. So get your vote in. We want 6 to make sure that everybody's word is heard. But at the 7 same time, if you have any other questions, get on with 8 us next Saturday on the 9th. Then the following Friday, 9 the voting deadline on the 15th. We'll be happy to 10 answer any questions you have. 11 Sam, thank you for hosting this. And 12 thank you for the thousands of people that were on this 13 call today. We'll be in touch soon. Thank you. 14 MR. ROECKER: Thanks, everyone. 15 16 17 18 19 2.0 21 22 23 24 25

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